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DEPARTMENT OF THE NAVY

COMMANDER
NAVAL BASE NORFOLK
1530 GILBERT ST. STE 2200
NORFOLK, VA 23511-2797

IN REPLY REFER TO:

5090
N452B/747
1 JUN 1998

Mr. Harry Harbold
Federal Facilities Branch
U. S. Environmental Protection Agency
Mail Code 3HW50
841 Chestnut Street
Philadelphia, PA 19107

Dear Mr. Harbold:

SUBJECT: NAVAL BASE, NORFOLK FEDERAL FACILITIES AGREEMENT

During our Resource Conservation and Recovery Act Facilities Assessment (RFA) (Kearney, 1992), thirty-eight oil/water separator (O/WS) units were recommended for further action. During discussions between the Navy and your office, it was agreed to place these O/WS in the *Findings of Fact* Section of the draft Federal Facilities Agreement for Naval Base, Norfolk (NBN). Thus, these units require no further cleanup action under the Comprehensive Environmental Response Compensation and Liability Act.

As requested, we are providing documents to verify unit status. Enclosure (1) provides an O/WS status summary. A discussion of the status of these units, by operability category, follows:

a. Stormwater Discharge Units. Ten O/WS units are connected to the stormwater drainage system. Four of these units were maintained by the former Naval Aviation Depot (NAVAVNDEPOT), Norfolk, which closed under the 1993 Base Realignment and Closure (BRAC) Act. Prior to Naval Air Station (NAS), Norfolk assuming responsibility for these units, they were cleaned and inspected; documentation is provided as enclosure (2). Per your request, the remaining six O/WS units, which are connected to the stormwater drainage system, were inspected for operational integrity. This inspection consisted of checking the physical condition of each O/WS, determining if the unit was operating as designed and looking for evidence of release. Enclosure (3) provides inspection findings for these six units.

b. Industrial Wastewater Management Plan Units. NBN has implemented a program to inspect and monitor sources discharging to the Hampton Roads Sanitation District (HRSD). The policy and

scope for this program are contained in the NBN Industrial Wastewater Management Plan (IWMP), enclosure (4). Fourteen O/WS units are managed and inspected under this program as pre-treatment devices; inspection worksheets are provided as enclosure (5).

c. Removed/Closed Units. Ten OW/S units have been demolished, or are planned for demolition as part of NBN's effort to reduce infrastructure. Two units were removed during the demolition and upgrade to the Firefighting School (FFS) in 1992; enclosure (6) contains applicable portions of the corrective action plan which removed these units. The FFS Waste Pit is inactive and scheduled for demolition along with other obsolete portions of the FFS facility; the scope of work for the demolition project is provided as enclosure (7). The holding trap identified as T-31 in the RFA was filled with soil during the demolition of Building MCE-57.

d. Inactive Units. Four O/WS units are inactive due to NAVAVNDEPOT Norfolk BRAC closure. Prior to transfer of responsibility to NAS Norfolk, these four units were cleaned and inspected. Documentation of these actions is provided in enclosure (2).

For additional information, please contact Mr. Tim Reisch, at (757) 322-2896.

Sincerely,



SHARON WALIGORA CUTCHIN
Director, Hazardous Waste Division
By direction of the Commander

- Enclosure:
1. Naval Base, Norfolk Oil/Water Separators Action List
 2. Summary of Environmental Issues, NADEP Norfolk
 3. Oil/Water Separator Integrity Certification
 4. Naval Base, Norfolk Industrial Wastewater Management Program
 5. Inspection and Service Log for Oil Water Separators (example)
 6. Corrective Action Plan for Fleet Training Center Firefighting School (applicable portions)
 7. Public Works Center, Norfolk (PWC) Memorandum

Copy to: ✓ Atlantic Naval Facilities Engineering Command, Norfolk